

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IRON WORKERS' MID-AMERICA)	
PENSION PLAN, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 07 C 1553
)	
TIM PRINTY, individually and d/b/a)	JUDGE CHARLES R. NORGLE
MAPLE CITY MASONRY,)	
)	
Defendant.)	

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on May 15, 2007, request this Court enter judgment against Defendant, TIM PRINTY, individually and d/b/a MAPLE CITY MASONRY. In support of that Motion, Plaintiffs state:

1. On May 15, 2007, this Court entered default against Defendant and granted Plaintiffs' order directing Defendant to turn over its monthly fringe benefit contribution reports for July 2006 through the present date for work performed in Local 63's jurisdiction and its reports for June 2006 through the present date for work performed in Local 111's jurisdiction. The Court retained jurisdiction to enforce the May 15, 2007 Order and to enter judgment against Defendant (a copy of the May 15, 2007 Order is attached hereto as Exhibit A).

2. Plaintiffs received all the contribution reports required to be submitted by Defendant pursuant to the May 15, 2007 Order. The contribution reports show that the Defendant is delinquent in contributions to the Funds for August 2006 through January 2007 in the amounts set forth below:

	<u>Contributions</u>
Mid-America Pension Plan	\$14,880.59
Supplemental Monthly Annuity (SMA) Fund	\$ 3,626.09
Tri-State Welfare Plan	\$11,111.28

(See Affidavits of Joseph J. Burke and David J. Jansen)

3. Additionally, the amount of \$2,463.28 is due for liquidated damages. (Burke Aff. Par. 4). Copies of the contribution reports submitted by Defendant are attached hereto as Exhibit B.

4. In addition, Plaintiffs' firm has expended the amount of \$402.00 for costs and \$718.75 in attorneys' fees in this matter. (See Affidavit of Catherine M. Chapman).

5. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$33,201.99.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$33,201.99.

/s/ Patrick N. Ryan

Patrick N. Ryan
 Attorney for Plaintiffs
 BAUM SIGMAN AUERBACH & NEUMAN, LTD.
 200 West Adams Street, Suite 2200
 Chicago, IL 60606-5231
 Bar No.: 6278364
 Telephone: (312) 236-4316
 Facsimile: (312) 236-0241
 E-Mail: pryan@baumsigman.com

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion for Entry of Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participants on or before the hour of 5:00 p.m. this 22nd day of June 2007:

Mr. Tim Printy
Maple City Masonry
100 W. Main
Geneseo, IL 61254

Mr. Tim Printy
Maple City Masonry
429 E. South Street
Geneseo, IL 61254

Mr. Bruce L. Carmen
Tellen, Horberg, Smith & Carmen, P.C.
124 W. Exchange Street
PO Box 179
Cambridge, IL 61238

/s/ Patrick N. Ryan

Patrick N. Ryan
Attorney for Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6278364
Telephone: (312) 236-4316
Facsimile: (312) 236-0241
E-Mail: pryan@baumsigman.com